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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

SEBASTIAN SYMEONIDES, an Individual;

Plaintiff,

vs.

TRUMP RUFFIN COMMERCIAL, LLC, a
Foreign Limited-Liability Company d/b/a
TRUMP INTERNATIONAL LAS VEGAS and
TRUMP INTERNATIONAL HOTEL &
TOWER LAS VEGAS; TRUMP RUFFIN
TOWER I, LLC, a Foreign Limited-Liability
Company; TRUMP INTERNATIONAL
HOTELS MANAGEMENT, LLC, a Foreign
Limited-Liability Company; OTIS ELEVATOR
CORPORATION, a Foreign Corporation; DOES
I through X, inclusive; and ROE BUSINESS
ENTITIES I through XX inclusive,

Defendants.

CASE NO. 2:23-cv-00854-JAD-VCF

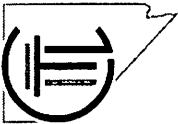
**STIPULATION AND ORDER TO
EXTEND OPPOSITION DEADLINES
TO DEFENDANT OTIS ELEVATOR
COMPANY'S MOTIONS**

ECF No. 59

IT IS HEREBY STIPULATED AND AGREED, by all parties, by and through their
respective counsel of record, that the deadlines for Plaintiff to file oppositions to Defendant Otis
Elevator Company's Motion to Exclude John Koshak's Expert Opinion (ECF No. 53), currently
due January 27, 2025, and Otis Elevator Company's Motion for Summary Judgment, currently
due February 3, 2025 (ECF No. 54), shall both be extended to February 17, 2025.

Defendant Otis Elevator Company filed a Motion to Exclude John Koshak's Expert

CHRISTIANSEN
— TRIAL LAWYERS —



Opinion [Dkt. #53] and a Motion for Summary Judgment [Dkt. #54] on January 13, 2025. Defendant Trump Ruffin Tower I, LLC filed Joinders to both motions [Dkt. #56 and #58].

The parties agreed to consolidate and extend the deadlines for Plaintiff to oppose the motion for summary judgment and the motion to exclude John Koshak. Good cause exists for this request because both the motion for summary judgment and the motion to exclude involve complex legal and factual issues that are interrelated. Properly addressing these motions requires a thorough review of extensive records, expert reports, deposition testimony, and case law to ensure the Court receives well-reasoned and comprehensive arguments. The issues raised in the motion for summary judgment and the motion to exclude are closely intertwined. Extending the deadlines will allow Plaintiff to present consistent and cohesive arguments, avoiding redundancy and ensuring that the Court has the full context to make an informed decision. Aligning the briefing deadlines for these motions will promote efficiency for all parties and the Court by consolidating overlapping efforts and ensuring all relevant arguments are presented in a unified manner.

This requested extension is made in good faith, and not for the purposes of delay.

Dated this 23rd day of January, 2025

Respectfully Submitted By:
CHRISTIANSEN TRIAL LAWYERS

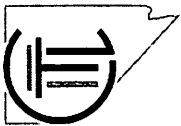
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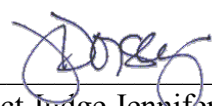
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13 *Ruffin Commercial, LLC, d/b/a Trump*
14 *International Vegas and Trump International*
15 *Hotel & Tower Las Vegas; and Trump*
16 *International Hotels Management, LLC*

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ORDER

Based on the parties' stipulation [ECF No. 59] and good cause appearing, IT IS ORDERED that the deadlines to oppose the motion to exclude John Koshak's Expert Opinion [ECF No. 53] and the motion for summary judgment [ECF No. 54] are extended to February 17, 2025.



U.S. District Judge Jennifer A. Dorsey
Dated: January 28, 2025

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